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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

☐ Affects PG&E Corporation **Debtors.**
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**SECOND SUPPLEMENTAL DECLARATION OF
JAMES MESTERHARM OF AP SERVICES, LLC**

Related Doc: Dkt. Nos. 867, 868, 1299, 1342

Pursuant to 28 U.S.C. § 1746, I, James Mesterharm, state under penalty of perjury, that:

1. I am a Managing Director of AlixPartners, LLP (“**AlixPartners**”), which has a place of business at 909 Third Avenue, Floor 30, New York, New York 10022.

2. I am duly authorized to execute this second supplemental declaration on behalf of AP Services, LLC (“**APS**”), an affiliate of AlixPartners LLP.

3. Except as otherwise noted, I have personal knowledge of the matters set forth herein and, if called as a witness, would testify competently thereto.

4. I am filing this second supplemental declaration to supplement the disclosures that were included in my original declaration dated March 13, 2019 [ECF No. 867] and my supplemental declaration dated April 11, 2019 [ECF No. 1342].

5. Unless otherwise noted, references to AP below collectively refer to AP Holdings, LLP, APS, and each of their respective subsidiaries. APS wishes to disclose the following:

- Accenture, a professional to the Debtors, is a creditor, joint venture party, vendor, litigation party, material contract party, customer, director-affiliated company and professional to current and former AP clients in matters unrelated to the Debtors. Accenture is a current and former AP

client in matters unrelated to the Debtors. Accenture is a former employer of current AP employees.


- Akin Gump Strauss Hauer & Feld (“**Akin Gump**”), a professional in this bankruptcy matter, is opposing counsel, counsel, a creditor and a professional to current and former AP clients in matters unrelated to the Debtor. Akin Gump is a current and former AP client in matters unrelated to the Debtor. Akin Gump is a vendor to AP.
- Baker & Hostetler LLP (“**Baker & Hostetler**”), a professional to the committee of unsecured creditors committee, is a professional, opposing counsel, and counsel to current and former AP clients in matters unrelated to the Debtors. Baker & Hostetler is a current AP client in matters unrelated to the Debtors. Baker & Hostetler is a vendor to AP.
- Centerbridge Partners, L.P., a notice of appearance party to the Debtors, and affiliates (“**Centerbridge**”) are adverse parties, parent companies, investors, shareholders, creditors, lenders, and litigation parties to current and former AP clients in matters unrelated to the Debtors. Centerbridge is a current and former AP client in matters unrelated to the Debtors. An AP board member is an investor in Centerbridge.
- KPMG LLP, a professional to the Debtors, and affiliates (“**KPMG**”) are professionals, adverse parties, vendors, material contract parties and creditors to current and former AP clients in matters unrelated to the Debtors. KPMG is a former AP client in matters unrelated to the Debtors. KPMG provides auditing services to AP. KPMG is a vendor to AP. KPMG is the former employer of several current AP employees.
- Lincoln Partners Advisors LLC, a creditor to the Debtors, is a professional to current and former AP clients in matters unrelated to the Debtors.
- Pension Benefit Guaranty Corporation (“**PBGC**”), a member to the committee of unsecured creditors, is a creditor, vendor and adverse party to current and former AP clients in matters unrelated to the Debtors. PBGC is a member of a UCC represented by AP in Bon-Ton Stores, Inc., The Great Atlantic & Pacific Tea Co. and VSI Liquidating Trust, bankruptcy matters unrelated to the Debtors.
- Perella Weinberg Partners, a professional in this bankruptcy matter, is a professional, vendor and creditor to current and former AP clients in matters unrelated to the Debtors.
- Sodexo, Inc., a notice of appearance party in this bankruptcy matter, and affiliates (“**Sodexo**”) are vendors and related parties to current and former AP clients in matters unrelated to the Debtors. Sodexo is a former AP client in matters unrelated to the Debtors. Sodexo is a vendor to AP.
- Western Asset Management Company, a member to the committee of unsecured creditors, is a lender, bondholder, noteholder, vendor, investor and creditor to current and former AP clients in matters unrelated to the Debtors.
- Willkie Farr & Gallagher, LLP (“**Willkie Farr**”), professional in this bankruptcy matter, is a professional, bondholder and counsel to current and former AP clients in matters unrelated to the Debtor. Willkie Farr is a current and former AP client in matters unrelated to the Debtor. Willkie Farr provides legal services to AP.

1 APS does not believe that the second supplemental disclosures above impact its
2 disinterestedness. I continue to reserve the right to supplement APS' disclosures in the event that APS
3 discovers any additional connections that require disclosure. If any new material relevant facts or
4 relationships are discovered or arise, APS will promptly file a supplemental declaration pursuant to
5 Bankruptcy Rule 2014(a).
6

7 I declare under penalty of perjury pursuant to 28 U.S.C. §1746 that the foregoing is true and
8 correct.

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10 Dated: May 1, 2019

AP Services, LLC

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13 James Mesterharm
14 Authorized Representative
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